

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

VIANA V. BAILEY ,
Plaintiff,
v.
WILLIAM OSCAR HARRIS, ET AL.,
Defendants.

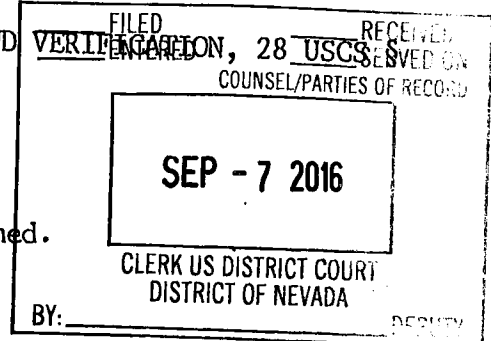
STATE OF NEVADA

CLARK COUNTY

Case No. 2:15-cv-2279

CLAIM FOR MANDATORY JUDICIAL NOTICE, NO. 1,
BY AFFIDAVIT, FREV 201 (c)(2)

AFFIRMATION AND
1746 (1)



: Affirmed and signed.

COMES NOW, the defendants herein, being of majority age, good moral character and competent to testify, with yes as yes and no as no, and in filing this Claim with this Honorable Court would state the following, to wit:

RELIEF SOUGHT

1. These defendants herein, pursuant to the mandatory provisions embodied in Federal Rules of Evidence ("FREV") 201 (c)(2), hereby move this Court to take mandatory judicial notice of the following facts:

a) 75 separate individuals, who have confessed to being parties in privity to the transactions, which gave rise to this instant proceeding, have provided conclusive judicial admissions in other legal proceedings pursuant to Federal Rules of Civil Procedure ("F.R.CIV.P.") 36 (a)(3) and (b), which are true, correct, certain and complete and speak to the facts of the matter involved herein, and

b) this witness-provided evidence, forthcoming from these 75 parties in privity, is both relevant and pertinent to these instant proceedings, in accordance with FREV 401, 801 (d) and 901 et seq., and serves to validate, authenticate and confirm the express contracts between the defendants and the UNITED STATES, which is the subject, in part, of this cause of action.

Judicial Notice Must Be Taken Because:

2. Rule 201 (c)(2) of the FREV provides that this Court MUST take mandatory judicial notice of the facts that are not reasonably subject to dispute when requested to do so by a party who supplies this Court with the necessary information.

3. The fact that is the subject of this Claim, namely, these 75 individuals' responses to requests for admissions, are being offered for the truth of the matter, coupled with full disclosure of all pertinent and relevant facts associated herewith offered in the

interest of justice.

4. The following sources establish the truth of the facts, as delineated in the relief sought in ¶ 1 above, of which judicial notice MUST be taken at:

a) United States District Court for the District of Columbia, case no. 1:14-cv-01875-JDB, notice of acceptance of responses, re requests for admissions, docket entry 9, and comprising 96 pages, and

b) United States District Court for the District of Columbia, case no. 1:14-cv-01875-JDB, affixed herewith as Exhibits 1 and 2 at pages 3 thru 15, are additional documents which were received by the Court for filing in the matter, that also fully comply with the mandates embodied in F.R.CIV.P. 36 (b), being provided for ease of reference.

CONCLUSION

5. With respect for the foregoing, these defendants hereby invoke this Court's mandatory non-discretionary duty to take due judicial notice of these herein referenced documents for the purposes of validation, authentication and confirmation of the express contracts by the named defendants with the UNITED STATES therein, as referenced in ¶ 1 above.

AFFIRMATION AND VERIFICATION

In accordance with 28 USCS § 1746 (1), under the pains and penalties of perjury, these defendants do hereby affirm and verify that the foregoing is all true, correct, certain, complete and not misleading, i.e. the facts of the matter, as done, signed and presented this 19 day of July, Common Era 2016.

by: [Signature]
WILLIAM OSCAR HARRIS

by: [Signature]
ROBERT DAVID NEAL

by: [Signature]
RALPH TAYLOR

CERTIFICATE OF SERVICE

On this 19 day of July, Common Era 2016, these defendants did place the foregoing in the U.S. Mails as follows:

VIANA V. BAILEY
124 N. Virginia Avenue
Atlantic City, N.J. 08401

by: [Signature]
WILLIAM OSCAR HARRIS
907 Cornerstone Place
Las Vegas, NV 89031

by: [Signature]
ROBERT DAVID NEAL
907 Cornerstone Place
Las Vegas, NV 89031

by: [Signature]
RALPH TAYLOR
907 Cornerstone Place
Las Vegas, NV 89031

RALPH TAYLOR, ET AL.,
Plaintiffs,

v.,

CHARLES E. SAMUELS, JR., ET AL.,
Defendants.

Case No. 1:14-cv-01875-JDB

2ND NOTICE OF ACCEPTANCE OF RESPONSES
TO REQUEST FOR ADMISSIONS, F.R.CIV.P.
36 (a) (3) & (b), BY AFFIDAVIT

STATE OF INDIANA

:

: Affirmed and signed.

VIGO COUNTY

:

COMES NOW, the Plaintiffs herein, being of majority age, good moral character and competent to testify, with yes as yes and no as no, and in filing this 2nd Notice would show this Honorable Court the following, to wit:

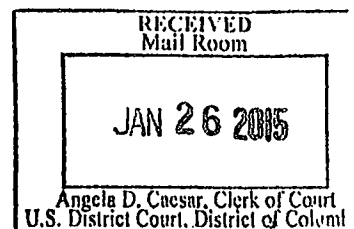
RECITALS

1. On November 10, 2014, with respect for the Federal court's preference to avoid the costs and problems associated with the formal process service of the Summons and the accompanying documents, as delineated in F.R.CIV.P. 4 (d), the two (2) initially named co-Defendants, Charles E. Samuels, Jr. ("Samuels") and Sarah Qureshi ("Qureshi"), along with the U.S. Department of Justice and the Civil Process Clerk for the U.S. Attorney for the District of Columbia, were ALL properly served with a Waiver of Service of Summons and these other required documents.
2. This service process met the Notice requirements detailed in F.R.CIV.P. 4 (i)(3). See U.S. Postal Service Tracking nos. 9114 9011 8986 6947 3683 58; 9114 9011 8986 6947 3683 71, and 9114 9011 8986 6947 3683 96.
3. Now with a response to this initial Complaint by Samuels and Qureshi, individually, due to be filed with this Court on or before January 9, 2015, see F.R.CIV.P. 12 (a)(1)(A) (ii) & (3), no such response has been forthcoming, i.e. a default.
4. With respect for the exempt status of these instant proceedings as defined in F.R. CIV.P. 26 (a)(1)(B)(iv), (d)(1) and (F)(1), on December 18, 2014, the following 51 named co-Defendants were each properly served with a Request for Admissions ("Request"), in accordance with F.R.CIV.P. 36 (a)(3), to:

Harley G. Lappin
Harrell Watts
Christopher Greiner
John C. Oliver

Jeff Gross
N. Tokish
Thomas R. Kane
Stephen Cope

Melissa J. Bayless
John F. Caraway
Diana Quinones
J. Dwyer



Michael L. Stephens
 Clint Swift
 Harvey G. Church
 J. Sisk
 L.C. Ward
 Michael K. Nalley
 Katherine Seireveld
 Leslie S. Smith
 Christopher Purdue
 J. Krimitski
 Francisco J. Quintana
 Eric Rardin
 J. Todd

Amber L. Nelson
 Charles L. Lockett, Jr.
 Bradley Shoemaker
 Amy Adams
 D. Moore
 Paul M. Laird
 J. Ballard
 V. Rigsby
 K. Myers
 J. Baker
 S. Johnson
 D. Ezekiel
 Jeffrey George

D. Mathews
 D. Ramey
 F. Timothy Coleman
 D. Holston
 Kathleen M. Kenney
 Leann LaRiva
 Joyce K. Conley
 Brian English
 Travis Weber
 Tereser A. Banks
 Elizabeth Keller
 Michael Sample
 C. Hiron




5. The process service of this Request was accomplished via accountable mail means through the U.S. Postal Service in accordance with F.R.CIV.P. 5.
6. After the mailing, the Postal Service reported back that the mailing had been properly received by the 51 co-Defendants. See F.R.CIV.P. 5(b)(1) & (2)(C), and Houston v. Lack, 487 US 266 (1988). Also see U.S.P.S. Tracking No. 9114 9012 3080 3776 8305 36.
7. F.R.CIV.P. 36 (a)(3) establishes a mandatory 30 day response period for a requested party to reply to such a Request as this or the matters as so addressed therein are to be deemed to be conclusively admitted to forevermore for the purposes of the proceedings. See Essroc Cement Corp. v. CTL/D.C., Inc., 740 F.Supp.2d 131 (D.C. DC Sept. 27, 2010); Anchorage - Hynning & Co. v. Moringiello, 697 F.2d 356, 363 (D.C. Cir 1983), and F.R.CIV. P. 36 (b).
8. This 30 day response time period must be adjusted for an additional 3 days, as per F.R.CIV.P. 6 (d), since this process service was completed through the mails, wherein this response period expires on January 20, 2015.
9. In the interest of judicial economy, a generic true copy of these Request(s), which was identical for each of these 51 co-Defendants, is attached hereto as Exhibit A at pages 4 thru 7 herein.
10. Each Request, however, was individualized with the co-Defendant's own name affixed thereto for proper identification.
11. Now, in accordance with the time constraints imposed by F.R.CIV.P. 36 (a)(3), this Court and these 51 co-Defendants are hereby NOTICED that the 30 day response period, as adjusted, has expired.
12. Further, NOTICE is also hereby given that not even one of these 51 named co-Defendants has brought forward a timely and proper response to these Requests.
13. F.R.CIV.P. 36 (b) dictates that these tacit non-responses of these 51 named co-De-

endants are herewith deemed to be contractual stipulations and final/firm admissions as to each and every matter put forward in these Requests.

14. Furthermore, these Plaintiffs now hereby serve NOTICE that they are accepting these non-responses from these 51 co-Defendants as such for the purposes of these proceedings, and thus not subject to further contravention, forevermore.

AFFIRMATION AND VERIFICATION

Under the pains and penalties of perjury, re 28 USCS § 1746 (1), these Plaintiffs affirm and verify the foregoing to be all true, correct, certain, complete and not misleading as done, signed and presented, without availability or access to a notary public, on this 20th day of January, Common Era 2015.

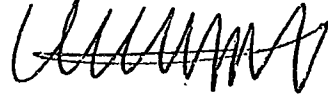
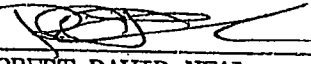

by: 	by: 	by: 
WILLIAM OSCAR HARRIS Plaintiff PO BOX 33, 40743050 TERRE HAUTE, IN 47808	ROBERT DAVID NEAL Plaintiff PO BOX 33, 15151180 TERRE HAUTE, IN 47808	RALPH TAYLOR Plaintiff PO BOX 33, 31628048 TERRE HAUTE, IN 47808

PROOF OF SERVICE

On this 20th day of January, Common Era 2015 a copy of the foregoing was sent to:

Charles E. Samuels, Jr., et al.
Defendants
c/o Joyce Zoldak, Assoc. General Counsel
Federal Bureau of Prisons (BOP)
320 First Street, NW
Washington, DC 20534

U.S. Attorney General and
U.S. Attorney for the District of Columbia
Civil Process Clerk
555 4th Street, NW
Washington, DC 20011

by: 	by: 	by: 
WILLIAM OSCAR HARRIS Plaintiff PO BOX 33, 40743050 TERRE HAUTE, IN 47808	ROBERT DAVID NEAL Plaintiff PO BOX 33, 15151180 TERRE HAUTE, IN 47808	RALPH TAYLOR Plaintiff PO BOX 33, 31628048 TERRE HAUTE, IN 47808

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

E X H I B I T 1

RALPH TAYLOR, et al.,
Plaintiffs,

-v-

CHARLES E. SAMUELS, JR., et al.
Defendants.

Case no. 1:14-cv-01875-JDB

REQUEST FOR ADMISSIONS, Fed.R.Civ.P. 36

TO:

c/o Federal Bureau of Prisons and the U.S. Department of Justice

These Plaintiffs hereby request that you admit, under oath, to ALL of the following matters for the purposes of this instant proceeding as required by Fed.R.Civ.P. 36 (a)(3) and (b) within thirty (30) days of this Request. See also Houston v. Lack, 487 US 266 (1988) and Fed.R.Civ.P. 5(b)(1)&(2)(C). This Request is being made pursuant to Fed.R.Civ.P. 3, 26(a)(1)(B)(iv), (d)(1), (f)(1) and 36 which establish the exempt status of this proceeding.

You responses hereto, if any, shall and will be signed by you personally as so required by Fed.R.Civ.P. 25(g). Your responses shall and will be used in this proceeding and/or any other legal proceeding, both judicial and extrajudicial, as these Plaintiffs deem necessary and appropriate in their sole discretion. If you choose to add to, supplement or deny these affirmative admissions, you must do so within the thirty (30) days as allotted in Fed.R.Civ.P. 36(a)(3). Otherwise, each and every matter as set forth herein shall automatically be deemed to be admitted and stipulated to by you and firmly established against you. Be so advised. You should attach additional pages hereto if more space is required for your responses.

Admission no. 1

Admit that the two initially named defendants herein, Charles E. Samuels, Jr. and Sarah Qureshi, have each individually pursuant to their judicial admissions brought forward via Fed.R.Civ.P. 36(b), identified you specifically by name as a culpable bad actor and knowing co-conspirator with them in their confirmed criminal RICO scheme (18 USC § 1961 et seq.) otherwise known as the Communications Management Unit ("CMU") program and facility that is the subject of this instant proceeding.

Response:

Admission no. 2

Admit that with your conclusive confessions as rendered in Admission no. 1 above, Fed.R.Civ.P. 19(a) et seq. requires you personally to be enjoined into this instant proceeding as an indispensable party, one to be called into account for your bad acts as more thoroughly detailed in the Complaint By Affidavit as filed with the Court herein.

Response:

Admission no. 3

Admit that you, between October 13, 2009 and this current date, either continuously or during some incremental part thereof while drawing remuneration from the de jure federal government and its Federal Bureau of Prisons ("FBOP"), have engaged yourself overtly in certain activities which have served to facilitate, manage and/or perpetuate the unregulated and unlawful existence and/or operations of the CMU program and facility that is situated within the confines of the Federal Corrections Institution in Terre Haute, Indiana ("FCI/IHA") in violation of the Administrative Procedures Act as codified in Title 5 of the United States Code.

Response:

Admission no. 4

Admit that you, having reviewed the initial Complaint By Affidavit as filed in this instant proceeding now unequivocally agree and confirm without further reservation of any kind whatsoever, that ALL of the allegations put forward by these Plaintiffs therein are ALL true, correct, certain and the facts of the matter and are thus not now or forevenmore subject to contravention pursuant the Fed.R.Civ.P. 35(b) or otherwise, leaving no genuine issue of material fact related thereto in dispute or controversy.

Response:

Admission no. 5

Admit that regarding the conclusive responses to the Requests for Admissions, Fed. R.Civ.P. 35(b) or otherwise rendered by certain Defendant(s)/Respondent(s) as filed in the courts as follows, you would have rendered the exact same responses, if so requested, in these separte but related legal proceedings in compliance with Fed.R.Civ.P. 35(a)(3) and (b):

- U.S. District Court/Southern Indiana, Case no. 2:12-cv-0344-LJM-WGH, Document no. 36, commencing on page no. 8;
- U.S. District Court/Southern Indiana, Case no. 2:13-cv-043-JMS-WGH, Document no. 16, commencing on page no. 6 of 18;
- U.S. District Court/Southern Indiana, Case no. 2:13-cv-311-JMS-WGH, Document no. 19, commencing on page no 5 of 20;
- U.S. Court of Federal Claims, Case no. 1:13-cv-019-FMA, Document no. 9, commencing on page no. 9 of 13;
- U.S. Court of Federal Claims, Case no. 1:13-cv-069-VJW, Document filed on July 15, 2013 (no. unknown), commencing on page no. 6 of 10; and
- U.S. Court of Federal Claims, Case no. 1:13-cv-834-LJB, Document no. 9, commencing on page 8 of 10.

Response:

Admission no. 6

Admit that your responses to Admission no. 5 above renders those responses to the Requests for Admission, Fed.R.Civ.P. 35(b) referenced therein to be truthful, complete, certain, the facts of the matter and relevant to this instant proceeding as extra-judicial admissions in accordance with Fed.R.Evid. 401, 801(d) and 901 or otherwise.

Response:

Admission no. 7

Admit that in accordance with Fed.R.Civ.P. 56 or otherwise and with respect for your conclusive admissions, confessions and stipulations as set forth herein by you via Fed.R.Civ.P. 35(b) or otherwise which you hereby waive: ALL current and future objections and challenges thereto, there is left no genuine issue of material fact in further dispute or controversy and thus these Plaintiffs are entitled to a summary judgment against you personally as well as each of the defendants, both named and unnamed; individually and severally for the entire amount of the relief sought in the Complaint By Affidavit filed herein plus any additional damages which might be sought by these Plaintiffs in any subsequent amendment(s) which might be filed thereto with the court.

Response:

Admission no. 8

Admit that having never being accused of nor sanctioned for an illicit use of the FBOP's modes of outside communications available to ALL non-CMU designated inmates including, but not limited to telephone and mail usage and contact visits prior to arriving at the unlawful and unregulated CMU program and facility inside the FCI/TIA, no genuine and legitimate penological interest or goal has been served by your criminal acts surrounding your personal participation in the placement and/or continued detention of those

United States affirmed actually innocent Plaintiffs into this illegal and unregulated CMU environment specifically designed to consciously deprive these Plaintiffs of their 1st, 5th and 8th Amendment constitutionally protected rights, i.e. false imprisonment as manifested in indefinite administrative detention creating a protected liberty interest thereby.

Response:

Admission no. 9

Admit that your personal motive for your continued, perpetual and ongoing violations of the constitutionally protected, inherent and civil rights of these actually innocent Plaintiffs including your participation in the false imprisonment thereof and your other federal and state criminal code violations as delineated herein or otherwise, ALL of which are already the subject of the FBOP's official agency determinations, are driven by your fear and your resulting overt attempts to avoid the civil and criminal sanctions that you as a RICO-inspired co-conspirator will most certainly face when your individual and collective bad acts are exposed for ALL of the world to see in an open and honest forum.

Response:

Admission no. 10

Admit that with respect for the applicable statute(s) at large as evidenced by 31 USCS § 3720(b) et seq.; qui tam, these Plaintiffs have good cause and statutory authority to initiate and prosecute a cause of action on behalf of your employer, the de jure federal government, in a court of appropriate jurisdiction with you as a named defendant to recover the compensatory damages it has suffered and accrued as a direct result of your bad acts you have confessed to herein which have served to impair the enforcement of the obligations embodied in the express settlement agreements between the United States and these Plaintiffs, i.e. tortious interference, resulting in your employer's default thereon and the impugning of its full faith and credit as established in Article IV, Clause 1 and Article VI, Clause 2 of the Constitution of the United States.

Response:

Admission no. 11

Admit that with your positive affirmation herewith that the restrictions and exceptions embodied in 31 USCS § 3729(b)(1)(B) or otherwise not applying to you personally due to your overt and concerted violations of your oath of office contract you have undertaken via Article VI, Clause 3 of the Constitution of the United States as codified at 5 USCS § 3331 or otherwise wherein you have admittedly failed to "... support and defend the Constitution of the United States..." and "...bear true faith and allegiance to the same...", the cause of action contemplated in Admission no. 10 above shall be deemed to be a valid claim with you personally liable for the damages sought to be recovered on behalf of your employer therein.

Response:

Admission no. 12

Admit that as a direct result of your ongoing criminal activities and actions as delineated in the Complaint by Affidavit filed herein and with your conclusive affirmation thereof as per Fed.R.Civ.P. 36(b), you as well as ALL of your RICO co-conspirators both known and unknown at this time cannot assert any defense of official immunity whatsoever nor enjoy representation by legal counsel paid for or employed by the de jure federal government, including its U.S. Department of Justice and ALL of its sub-departments and agencies thereof, etc. such as the Office of the United States Attorney.

Response:

Admission no. 13

Admit that venue is proper in this Court to fully adjudicate this cause of action, and with your waiver of ALL future objections thereto, Joyce Zoldak, located at the Office of the General Counsel of the FBOP, 320 First Street NW, Washington, DC 20534 is hereby empowered by you to accept service of process in accordance with Fed.R.Civ.P. 5 or otherwise of ALL documents associated herewith on your behalf.

Response:

Admission No. 14

Admit that NO court anywhere, Federal or otherwise, has ever issued a valid order of commitment under the original signature and impressed seal of the clerk of that court, as required in the statutes at large and evidenced by 18 USCS § 3621(c) and 28 USCS § 1651, recognized in FBOP internal guideline no. PS 5800.12, Section 203 and required upon the FBOP, as jailer(s) to detain these three (3) Plaintiffs, individually, for even one (1) minute.

Response:

In accordance with Fed.R.Civ.P. 26(g) and 28 USCS § 1746(2) or otherwise, I do hereby certify under the pains and penalties of perjury, that the foregoing is ALL true, correct, certain, complete, not misleading and the facts of the matters as if it were sworn testimony evidence rendered from the witness stand and now presented herein for the purposes of these instant proceedings in accordance with Fed.R.Civ.P. 36(b) or otherwise.

Date:

by:

c/o Office of the General Counsel
Attn: Joyce Zoldak
Federal Bureau of Prisons
320 First Street NW
Washington, DC 20534

CERTIFICATE OF SERVICE

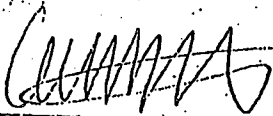
Under the pains and penalties of perjury, re 28 USCS § 1746(1), the Plaintiffs herein do certify that on the 8th day of December, 2014, they did give the foregoing to FBOP employee Clint Swift for further deposit into the outgoing CMU/FCI/IMA mail system for further delivery to the U.S. Postal Service in accordance with Fed.R.Civ.P. 5(b)(1) and (2)(c). See also Houston v. Lack, 487 US 266 (1988). The foregoing was enclosed in two separate envelopes properly addressed as follows with adequate postage affixed:

c/o Federal Bureau of Prisons
Office of the General Counsel
Attn: Joyce Zoldak
320 First St.
Washington, DC 20534

USPS no.

U.S. Attorney's Office
c/o Civil Process Clerk
555 4th Street NW
Washington, DC 20011

by:



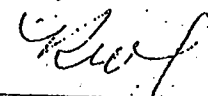
WILLIAM OSCAR HARRIS
Plaintiff
PO BOX 33, 40743050
TERRE HAUTE, IN 47808

by:



ROBERT DAVID NEAL
Plaintiff
PO BOX 33, 15151180
TERRE HAUTE, IN 47808

by:



RALPH TAYLOR
Plaintiff
PO BOX 33, 31628048
TERRE HAUTE, IN 47808

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIARALPH TAYLOR, ET AL.,
Plaintiffs,

v.

CHARLES E. SAMUELS, JR., ET AL.,
Defendants.

Case No. 1:14-cv-01875-JDB

3RD NOTICE OF ACCEPTANCE OF RESPONSES
TO REQUEST FOR ADMISSIONS, F.R.CIV.P.
36 (a)(3) & (b), BY AFFIDAVIT

STATE OF INDIANA

:

: Affirmed and signed.

VIGO COUNTY

:

COMES NOW, for the Plaintiffs, one of the Plaintiffs, WILLIAM OSCAR HARRIS ("HARRIS") herein, being of majority age, good moral character and competent to testify, with yes as yes and no as no, and in filing this 3rd Notice would show this Honorable Court the following, to wit:

RECITALS

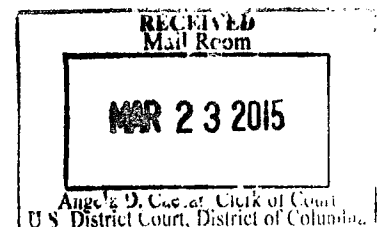
1. On February 25, 2015, these Plaintiffs duly accepted the tacit responses to the Request for Admissions ("Request"), which had been previously submitted to secondarily joined 22 named co-Defendants, on January 8, 2015, and each properly served, in accordance with F.R.CIV.P. 36 (a)(3), to:

K.S. Hooper	S. Walters	Lt. Winterberg
N. LaDune	C. DeSmith	R. Herbert
C. Williams	B. Kelsheimer	S. Butler
D. Cooksey	F. Semain	D. Strong
S. Morin	D. Scott Dodrill	B. Islom
C. Holl	Charles Daniels	S. Pound
V. Sears	Richard W. Schott	G. Stine
J. Spears		

2. The process service and confirmation was accomplished via accountable mail means, thru the U.S. Postal Service, re Tracking No. 9114 9999 4423 8468 8813 68.

3. With this formal acceptance, the matters addressed in these documents are now deemed by F.R.CIV.P. 36 (b) to be conclusively established, with binding legal effect, and not subject to further contravention for the purposes of these proceedings.

4. In the interest of judicial economy, a generic true copy of these Request(s), which were identical and individualized for each of these 22 identified and named co-Defendants' own name affixed thereto for proper identification, is attached hereto as Exhibit A at pages 3 thru 6 herein.



5. Further, in accordance with the time constraints imposed by F.R.CIV.P. 36 (a)(3), coupled with these tacit non-responses of these 22 identified and named co-Defendants, being herewith deemed to be contractual stipulations and final/firm admissions as to each and every matter put forward in these Request(s), they are hereby NOTICED that the 30 day response period, as adjusted for 3 additional days, has expired.


6. Furthermore, these Plaintiffs now hereby serve NOTICE that they are accepting these non-responses from those 22 co-Defendants for the purposes of these proceedings, which are not subject to further contravention, forevermore.

AFFIRMATION AND VERIFICATION

Under the pains and penalties of perjury, re 28 USCS § 1746 (1), HARRIS, for the Plaintiffs, affirms and verifies the foregoing is all true, correct, certain, complete and not misleading as done, signed and presented, absent access or availability to a notary public, on this 25th day of February, Common Era 2015.

For the Plaintiffs:

by:


WILLIAM OSCAR HARRIS
Plaintiff
PO BOX 33, 40743050
TERRE HAUTE, IN 47808

PROOF OF SERVICE

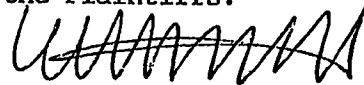
On this 25th day of February, Common Era 2015, HARRIS affirms that a copy of the foregoing was submitted to mail, exact postage, addressed to:

Charles E. samuels, Jr., et al.
Defendants
c/o Joyce Zoldak, Assoc. General Counsel
Federal Bureau of prisons (BOP)
320 First Street, NW
Washington, DC 20534

U.S. Attorney General and
U.S. Attorney for the District of Columbia
Civil Process Clerk
555 4th Street, NW
Washington, DC 20011

For the Plaintiffs:

by:


WILLIAM OSCAR HARRIS
Plaintiff
PO BOX 33, 40743050
TERRE HAUTE, IN 47808

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

RALPH TAYLOR, et al.,
Plaintiffs,

-v-

CHARLES E. SAMUELS, JR., et al.
Defendants.

Case no. 1:14-cv-01875-JDB

REQUEST FOR ADMISSIONS, Fed.R.Civ.P. 36

TO:

c/o Federal Bureau of Prisons and the U.S. Department of Justice

These Plaintiffs hereby request that you admit, under oath, to ALL of the following matters for the purposes of this instant proceeding as required by Fed.R.Civ.P. 36 (a)(3) and (b) within thirty (30) days of this Request. See also Houston v. Lack, 487 US 266 (1988) and Fed.R.Civ.P. 5(b)(1)&(2)(C). This Request is being made pursuant to Fed.R.Civ.P. 3, 26(a)(1)(B)(iv), (d)(1), (f)(1) and 36 which establish the exempt status of this proceeding.

You responses hereto, if any, shall and will be signed by you personally as so required by Fed.R.Civ.P. 26(g). Your responses shall and will be used in this proceeding and/or any other legal proceeding, both judicial and extrajudicial, as these Plaintiffs deem necessary and appropriate in their sole discretion. If you choose to add to, supplement or deny these affirmative admissions, you must do so within the thirty (30) days as allotted in Fed.R.Civ.P. 36(a)(3). Otherwise, each and every matter as set forth herein shall automatically be deemed to be admitted and stipulated to by you and firmly established against you. Be so advised. You should attach additional pages hereto if more space is required for your responses.

Admission no. 1

Admit that the two initially named defendants herein, Charles E. Samuels, Jr. and Sarah Qureshi, have each individually pursuant to their judicial admissions brought forward via Fed.R.Civ.P. 36(b), identified you specifically by name as a culpable bad actor and knowing co-conspirator with them in their confirmed criminal RICO scheme (18 USCS § 1961 et seq.) otherwise known as the Communications Management Unit ("CMU") program and facility that is the subject of this instant proceeding.

Response:

Admission no. 2

Admit that with your conclusive confessions as rendered in Admission no. 1 above, Fed.R.Civ.P. 19(a) et seq. requires you personally to be enjoined into this instant proceeding as an indispensable party, one to be called into account for your bad acts as more thoroughly detailed in the Complaint By Affidavit as filed with the Court herein.

Response:

Admission no. 3

Admit that you, between October 13, 2009 and this current date, either continuously or during some incremental part thereof while drawing remuneration from the de jure federal government and its Federal Bureau of Prisons ("FBOP"), have engaged yourself overtly in certain activities which have served to facilitate, manage and/or perpetuate the unregulated and unlawful existence and/or operations of the CMU program and facility that is situated within the confines of the Federal Corrections Institution in Terre Haute, Indiana ("FCI/THA") in violation of the Administrative Procedures Act as codified in Title 5 of the United States Code.

Response:

Admission no. 4

Admit that you, having reviewed the initial Complaint By Affidavit as filed in this instant proceeding now unequivocally agree and confirm without further reservation of any kind whatsoever, that ALL of the allegations put forward by these Plaintiffs therein are ALL true, correct, certain and the facts of the matter and are thus not now or forevermore subject to contravention pursuant the Fed.R.Civ.P. 36(b) or otherwise, leaving no genuine issue of material fact related thereto in dispute or controversy.

Response:

Admission no. 5

Admit that regarding the conclusive responses to the Requests for Admissions, Fed. R.Civ.P. 36(b) or otherwise rendered by certain Defendant(s)/Respondent(s) as filed in the courts as follows, you would have rendered the exact same responses, if so requested, in these separate but related legal proceedings in compliance with Fed.R.Civ.P. 36(a)(3) and (b):

- U.S. District Court/Southern Indiana, Case no. 2:12-cv-0344-LJM-WGH, Document no. 36, commencing on page no. 8;
- U.S. District Court/Southern Indiana, Case no. 2:13-cv-043-JMS-WGH, Document no. 16, commencing on page no. 6 of 18;
- U.S. District Court/Southern Indiana, Case no. 2:13-cv-311-JMS-WGH, Document no. 19, commencing on page no 5 of 20;
- U.S. Court of Federal Claims, Case no. 1:13-cv-019-FMA, Document no. 9, commencing on page no. 9 of 13;
- U.S. Court of Federal Claims, Case no. 1:13-cv-069-VJW, Document filed on July 15, 2013 (no. unknown); commencing on page no. 6 of 10; and
- U.S. Court of Federal Claims, Case no. 1:13-cv-834-LJB, Document no. 9, commencing on page 8 of 10.

Response:

Admission no. 6

Admit that your responses to Admission no. 5 above renders those responses to the Requests for Admission, Fed.R.Civ.P. 36(b) referenced therein to be truthful, complete, certain, the facts of the matter and relevant to this instant proceeding as extrajudicial admissions in accordance with Fed.R.Evid. 401, 801(d) and 901 or otherwise.

Response:

Admission no. 7

Admit that in accordance with Fed.R.Civ.P. 56 or otherwise and with respect for your conclusive admissions, confessions and stipulations as set forth herein by you via Fed.R.Civ.P. 36(b) or otherwise which you hereby waives ALL current and future objections and challenges thereto, there is left no genuine issue of material fact in further dispute or controversy and thus these Plaintiffs are entitled to a summary judgment against you personally as well as each of the defendants, both named and unnamed, individually and severally for the entire amount of the relief sought in the Complaint By Affidavit filed herein plus any additional damages which might be sought by these Plaintiffs in any subsequent amendment(s) which might be filed thereto with the court.

Response:

Admission no. 8

Admit that having never being accused of nor sanctioned for an illicit use of the FBOP's modes of outside communications available to ALL non-CMU designated inmates including, but not limited to telephone and mail usage and contact visits prior to arriving at the unlawful and unregulated CMU program and facility inside the FCI/INA, no genuine and legitimate penological interest or goal has been served by your criminal acts surrounding your personal participation in the placement and/or continued detention of these

United States affirmed actually innocent Plaintiffs into this illegal and unregulated CMU environment specifically designed to consciously deprive these Plaintiffs of their 1st, 5th and 8th Amendment constitutionally protected rights, i.e. false imprisonment as manifested in indefinite administrative detention creating a protected liberty interest thereby.

Response:

Admission no. 9

Admit that your personal motive for your continued, perpetual and ongoing violations of the constitutionally protected, inherent and civil rights of these actually innocent Plaintiffs including your participation in the false imprisonment thereof and your other federal and state criminal code violations as delineated herein or otherwise, ALL of which are already the subject of the FBOP's official agency determinations, are driven by your fear and your resulting overt attempts to avoid the civil and criminal sanctions that you as a RICO-inspired co-conspirator will most certainly face when your individual and collective bad acts are exposed for ALL of the world to see in an open and honest forum.

Response:

Admission no. 10

Admit that with respect for the applicable statute(s) at large as evidenced by 31 USCS § 3730(b) et seq., qui tam, these Plaintiffs have good cause and statutory authority to initiate and prosecute a cause of action on behalf of your employer, the de jure federal government, in a court of appropriate jurisdiction with you as a named defendant to recover the compensatory damages it has suffered and accrued as a direct result of your bad acts you have confessed to herein which have served to impair the enforcement of the obligations embodied in the express settlement agreements between the United States and these Plaintiffs, i.e. tortious interference, resulting in your employer's default thereon and the impugning of its full faith and credit as established in Article IV, Clause 1 and Article VI, Clause 2 of the Constitution of the United States.

Response:

Admission no. 11

Admit that with your positive affirmation herewith that the restrictions and/exceptions embodied in 31 USCS § 3729(b)(1)(B) or otherwise not applying to you personally due to your overt and concerted violations of your oath of office contract you have undertaken via Article VI, Clause 3 of the Constitution of the United States as codified at 5 USCS § 3331 or otherwise wherein you have admittedly failed to "... support and defend the Constitution of the United States..." and "...bear true faith and allegiance to the same...", the cause of action contemplated in Admission no. 10 above shall be deemed to be a valid claim with you personally liable for the damages sought to be recovered on behalf of your employer therein.

Response:

Admission no. 12

Admit that as a direct result of your ongoing criminal activities and actions as delineated in the Complaint by Affidavit filed herein and with your conclusive affirmation thereof as per Fed.R.Civ.P. 36(b), you as well as ALL of your RICO co-conspirators both known and unknown at this time cannot assert any defense of official immunity whatsoever nor enjoy representation by legal counsel paid for or employed by the de jure federal government, including its U.S. Department of Justice and ALL of its sub-departments and agencies thereof, etc. such as the Office of the United States Attorney.

Response:

Admission no. 13

Admit that venue is proper in this Court to fully adjudicate this cause of action, and with your waiver of ALL future objections thereto, Joyce Zoldak, located at the Office of the General Counsel of the FBOP, 320 First Street NW, Washington, DC 20534 is hereby empowered by you to accept service of process in accordance with Fed.R.Civ.P. 5 or otherwise of ALL documents associated herewith on your behalf.

Response:

Admission No. 14

Admit that NO court anywhere, Federal or otherwise, has ever issued a valid order of commitment under the original signature and impressed seal of the clerk of that court, as required in the statutes at large and evidenced by 18 USCS § 3621(c) and 28 USCS § 1651, recognized in FBOP internal guideline no. PS.5800.12, Section 203 and required upon the FBOP, as jailer(s) to detain these three (3) Plaintiffs, individually, for even one (1) minute.

Response:

In accordance with Fed.R.Civ.P. 26(g) and 28 USCS § 1746(2) or otherwise, I do hereby certify under the pains and penalties of perjury, that the foregoing is ALL true, correct, certain, complete, not misleading and the facts of the matters as if it were sworn testimony evidence rendered from the witness stand and now presented herein for the purposes of these instant proceedings in accordance with Fed.R.Civ.P. 36(b) or otherwise.

Date:

by:

c/o Office of the General Counsel
Attn: Joyce Zoldak
Federal Bureau of Prisons
320 First Street NW
Washington, DC 20534

CERTIFICATE OF SERVICE

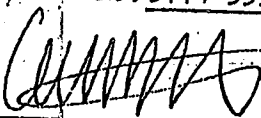
Under the pains and penalties of perjury, re 28 USCS § 1746(1), the Plaintiffs herein do certify that on the 8th day of January, 2015 they did give the foregoing to FBOP employee Clint Swift for further deposit into the outgoing CMU/FCI/INA mail system for further delivery to the U.S. Postal Service in accordance with Fed.R.Civ.P. 5(b)(1) and (2)(c). See also *Houston v. Lack*, 487 US 256 (1988). The foregoing was enclosed in two separate envelopes properly addressed as follows with adequate postage affixed:

c/o Federal Bureau of Prisons
Office of the General Counsel
Attn: Joyce Zoldak
320 First St.
Washington, DC 20534

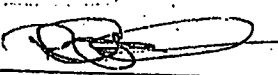
U.S. Attorney's Office
c/o Civil Process Clerk
555 4th Street NW
Washington, DC 20011

USPS no. 9114 9999 4423 8468 8813 68

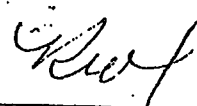
by:


WILLIAM OSCAR HARRIS
Plaintiff
PO BOX 33, 40743050
TERRE HAUTE, IN 47808

by:


ROBERT DAVID NEAL
Plaintiff
PO BOX 33, 15151180
TERRE HAUTE, IN 47808

by:


RALPH TAYLOR
Plaintiff
PO BOX 33, 31628048
TERRE HAUTE, IN 47808